

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

IN RE: CASE NO. 2:23-BK-11720-VZ
JEFFREY MARC SISKIND, CHAPTER 13
Debtor.

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**DEBTOR'S VERIFIED RESPONSE TO THE CHAPTER 13 TRUSTEE'S
OBJECTION TO DEBTOR'S ORIGINAL SCHEDULE C FILED ON MARCH 23, 2023**

COMES NOW the Debtor, and files this Debtor's Verified Response to the Chapter 13 Trustee's Objection to Debtor's Original Schedule C Filed on March 23, 2023, and states:

1. Debtor filed its original Schedule C on March 23, 2023.
2. The 341 Meeting of Creditors was held on May 4, 2023.
3. On May 23, 2023, the Chapter 13 Trustee timely filed a Notice of Objection to Debtor's Claim of Exemption; Memorandum of Points and Authorities; Declaration in Support Thereof (the "Objection"), within which the Trustee noted that the Debtor failed to specify applicable law, and requested that Debtor's claimed exemptions therefore be disallowed.
4. In its Objection, the Trustee alleged that the Debtor must set forth appropriate California state exemptions. However, this allegation is contrary to the bankruptcy rules which require that exemptions for the state that the Debtor considered to be its domicile two years prior to filing its petition be used if the Debtor has not lived in the filing jurisdiction for less than two (2) years.
5. On May 31, 2023, Debtor filed an amended Schedule C at ECF 27, within which Debtor cites to Florida exemptions. Debtor utilized Florida Exemptions because Debtor has not lived in California for two years and is required to use Florida exemptions.

6. Debtor believes that its amended Schedule C resolves all of the objections raised by the Chapter 13 Trustee in its objection.

7. After filing its amended Schedule C, Debtor tried to contact the file attorney at the Chapter 13 Trustee's office to request that it drop its Objection, making a hearing on this matter unnecessary. Debtor left several messages but has not received a response as of this date.

WHEREFORE, Debtor responds to the Chapter 13 Trustee's Objection and requests that the Court find that the Debtor's amended Schedule C attached as Exhibit A hereto is correct.

VERIFICATION

I attest under the penalty of perjury that the facts alleged herein are true and correct.

/s/ Jeffrey M. Siskind
Jeffrey M. Siskind, Pro Se Debtor

Respectfully submitted this 3rd day of July, 2023,

/s/ Jeffrey M. Siskind
Jeffrey M. Siskind, Pro Se Debtor
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Emails: jeffsiskind@msn.com & jeffsiskind@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing response was provided to the Office of Nancy K. Curry, Chapter 13 Trustee, and all parties registered to receive notices by CM/ECF on July 3, 2023.

/s/ Jeffrey M. Siskind
Jeffrey M. Siskind, Pro Se Debtor

EXHIBIT A

Fill in this information to identify your case:

Debtor 1	Jeffrey Marc Siskind		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse, if filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the: Central District of California			
Case number (If known) 2:23-bk-11720-VZ			

Check if this is an amended filing

Official Form 106C**Schedule C: The Property You Claim as Exempt**

04/22

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. Using the property you listed on *Schedule A/B: Property* (Official Form 106A/B) as your source, list the property that you claim as exempt. If more space is needed, fill out and attach to this page as many copies of *Part 2: Additional Page* as necessary. On the top of any additional pages, write your name and case number (if known).

For each item of property you claim as exempt, you must specify the amount of the exemption you claim. One way of doing so is to state a specific dollar amount as exempt. Alternatively, you may claim the full fair market value of the property being exempted up to the amount of any applicable statutory limit. Some exemptions—such as those for health aids, rights to receive certain benefits, and tax-exempt retirement funds—may be unlimited in dollar amount. However, if you claim an exemption of 100% of fair market value under a law that limits the exemption to a particular dollar amount and the value of the property is determined to exceed that amount, your exemption would be limited to the applicable statutory amount.

Part 1: Identify the Property You Claim as Exempt

1. Which set of exemptions are you claiming? Check one only, even if your spouse is filing with you.

- You are claiming state and federal nonbankruptcy exemptions. 11 U.S.C. § 522(b)(3)
 You are claiming federal exemptions. 11 U.S.C. § 522(b)(2)

2. For any property you list on *Schedule A/B* that you claim as exempt, fill in the information below.

Brief description of the property and line on <i>Schedule A/B</i> that lists this property	Current value of the portion you own	Amount of the exemption you claim	Specific laws that allow exemption
	Copy the value from <i>Schedule A/B</i>	Check only one box for each exemption.	
Brief description: 2013 BMW 320i	\$4,000.00	<input type="checkbox"/> \$ _____ <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Florida Statutes, Sections 222.25(1) and (4)
Line from <i>Schedule A/B</i> : 3.1			
Brief description: Trailers Unknown	\$500.00	<input type="checkbox"/> \$ _____ <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Florida Statutes, Section 222.25(4)
Line from <i>Schedule A/B</i> : 4.2			
Brief description: 2000 Kawasaki STX	\$1,760.00	<input type="checkbox"/> \$ _____ <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Florida Statutes, Section 222.25(4), Fla. Constitution Article X(4)(a)(2)
Line from <i>Schedule A/B</i> : 4.1			

3. Are you claiming a homestead exemption of more than \$189,050?

(Subject to adjustment on 4/01/25 and every 3 years after that for cases filed on or after the date of adjustment.)

- No
 Yes. Did you acquire the property covered by the exemption within 1,215 days before you filed this case?
 No
 Yes

Debtor 1 Jeffrey Marc Siskind

First Name Middle Name

Last Name

Part 2: Additional Page

Brief description of the property and line on Schedule A/B that lists this property	Current value of the portion you own Copy the value from Schedule A/B	Amount of the exemption you claim <i>Check only one box for each exemption</i>	Specific laws that allow exemption
Brief description: <u>Misc. Clothing</u> Line from Schedule A/B: <u>11</u>	\$ <u>300.00</u>	<input type="checkbox"/> \$ _____ <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Florida Statutes, Section 222.25(4)
Brief description: <u>Ipad Tablet</u> Line from Schedule A/B: <u>7</u>	\$ <u>200.00</u>	<input type="checkbox"/> \$ _____ <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Florida Statutes, Section 222.25(4)
Brief description: <u>Watch</u> Line from Schedule A/B: <u>12</u>	\$ <u>250.00</u>	<input type="checkbox"/> \$ _____ <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	Florida Statutes, Section 222.25(4)
Brief description: Line from Schedule A/B:	\$ _____	<input type="checkbox"/> \$ _____ <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	
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